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MEMBER: N.Y. & N.J. BAR

MEMO ENDORSED

9/1/21

August 31, 2021

Via ECF and Email

The Honorable Coleen McMahon  
United States District Court Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

CASE Adj AS to all defendants  
to November 9, 2021 at 4 PM —  
time excluded in the interest  
of justice, to allow for the  
REVIEW of discovery.

Re: *United States v. Sabitri Laforest, Garry Laforest, et al* 21 cr 272

Dear Judge McMahon:

*Coleen McMahon*

I represent Sabitri Laforest in the above referenced matter. I write on behalf of Ms. Laforest and on behalf of all the defense counsel in this matter- Thomas Dunn on behalf of Garry Laforest, Brian Kaplan on behalf of Tatania Laforest, and Barry Goldberg on behalf of Sanjay Laforest, seeking an adjournment of the status conference scheduled in this matter on September 14<sup>th</sup> at noon, until November 9<sup>th</sup> at 4:00 P.M. Assistant United States Attorney Matthew Shahabian consents to this request. The adjournment is sought because the defense has not to date received discovery. The Government advises discovery should be distributed within the next week. The discovery is voluminous and expected to involve over 6 TB of data. Accordingly, all defense counsel agree that on behalf of their respective clients to waive speedy trial and urge the Court to find the ends of justice are best served by the exclusion of speedy trial until the next conference date to afford all defendants time to review discovery, meet and confer with their counsel, and to provide a reasonable time necessary for the effective preparation for trial. See 18 USC. § 3161(h)(7)(A)(B)(iv).

Respectfully submitted,

/s/

Donna R. Newman

Cc: AUSA Matthew Shahabian via ECF email  
All Defense Counsel via ECF email

